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7 Attorneys for Defendants
SLM CORPORATION and SALLIE MAE, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

1 WHEREAS, plaintiffs Andrew Bradshaw, Tanif Stephenson, Adam Corriveau and Jesell
2 Gonzalez (“Plaintiffs”) filed their Class Action Complaint for Equitable, Declaratory and
3 Injunctive Relief and Damages For (1) Aiding and Abetting Fraud, (2) Mistake of Fact, (3) Unjust
4 Enrichment, (4) Violations of the California Unfair Competition Law, and (5) Violations of the
5 Oklahoma Consumer Protection Act (“Complaint”) on December 17, 2012;

6 WHEREAS, on or about January 16, 2013, the Complaint was served on defendants SLM
7 Corporation and Sallie Mae, Inc. (“Defendants”);

8 WHEREAS, Plaintiffs filed their First Amended Class Action Complaint (“FAC”) on
9 February 4, 2013;

10 WHEREAS, on or about February 4, 2013, counsel for Defendants agreed to accept service
11 of the FAC on behalf of Defendants;

12 WHEREAS, Defendants’ response to the FAC currently is due on March 22, 2013;

13 WHEREAS, Plaintiffs have agreed to grant Defendants an extension of time to file a
14 response to the FAC up to and including March 29, 2013;

15 WHEREAS, Defendants have notified Plaintiffs of their intent to file a Motion to Dismiss
16 the FAC;

17 WHEREAS, the parties have agreed on a proposed briefing schedule for Defendants’
18 Motion to Dismiss;

19 WHEREAS, a Case Management Conference is currently set for April 19, 2013;

20 WHEREAS, to conserve judicial resources, the parties have further agreed to stay discovery
21 and other proceedings until after the hearing on the Motion to Dismiss;

22 WHEREAS, pursuant to Civil Local Rules 6-1(b) and 6-2, the parties may request an order
23 changing a deadline that would extend deadlines set forth in the Local Rules or Federal Rules;

24 WHEREAS, this Stipulation is made in good faith and not for purposes of delay; and

25 WHEREAS, good cause exists for the foregoing modifications to the case schedule because
26 it would promote judicial efficiency to stay discovery and to continue the Case Management

1 Conference and the parties' submission of their Joint Case Management Statement until after the
2 hearing on the motion to dismiss.

3 IT IS HEREBY STIPULATED by and between the parties, through their respective counsel
4 of record, as follows:

- 5 (a) Defendants' Motion to Dismiss shall be filed and served by March 29, 2013;
6 (b) Plaintiffs' Opposition to the Motion to Dismiss shall be filed and served by May 3,
7 2013, and Defendants' Reply shall be filed and served by May 17, 2013;
8 (c) The date of the hearing on the Motion to Dismiss shall be May 24, 2013, at 9:00
9 a.m. in Courtroom 11;
10 (d) Pending a ruling on the Motion to Dismiss, all discovery shall be stayed;
11 (e) The Case Management Conference set for April 19, 2013 at 1:30 p.m. shall be
12 continued to July 26, 2013, 2013 at 1:30 p.m.;

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1 (f) The parties shall complete initial disclosures or state their objections and file their
2 Rule 26(f) Report and Joint Case Management Statement on or before July 19, 2013.

3 Dated: March 20, 2013

4 STROOCK & STROOCK & LAVAN LLP
5 JULIA B. STRICKLAND
6 LISA M. SIMONETTI
7 KRISTINA A. DEL VECCHIO

8 By: _____
9 /s/ Lisa M. Simonetti
10 Lisa M. Simonetti

11 Attorneys for Defendants
12 SLM CORPORATION and SALLIE MAE,
13 INC.

14 Dated: March 20, 2013

15 WOLF LEGAL, P.C.
16 ADAM B. WOLF
17 TRACEY DEMMON BERGER

18 GREENFIELD SULLIVAN DRAA &
19 HARRINGTON LLP
20 CHRISTOPHER D. SULLIVAN
21 MATTHEW R. SCHULTZ

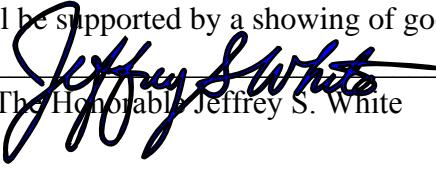
22 By: _____
23 /s/ Adam B. Wolf
24 Adam B. Wolf

25 Attorneys for Plaintiffs
26 ANDREW BRADSHAW, TANIF
27 STEPHENSON, ADAM CORRIVEAU,
28 and JESELL GONZALEZ

19 **[PROPOSED] ORDER**
20 Pursuant to the stipulation, the Court adopts the proposed briefing schedule and continuation of the
21 **PURSUANT TO THE STIPULATION, IT IS SO ORDERED.**

22 case management conference. The hearing on will be held on May 31, 2013. The parties are admonished
23 that future requests to alter briefing schedules shall be supported by a showing of good cause.

24 Dated: March 25, 2013

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26 The Honorable Jeffrey S. White